

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DAN SCHANTZ FARM & GREENHOUSES,
LLC,

Plaintiff,

v.

DAVID J. CATANZARO

Defendant

CIVIL ACTION

NO. 5:2017-cv-00403

THE HONORABLE
JEFFREY L. SCHMEHL

DEFENDANT'S RULE 26(a)(1) DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant David J Catanzaro makes the following initial disclosures subject to the conditions stated below.

CONDITIONS

All disclosures are made without waving or in tending to waive but, to the contrary, preserving and intending to preserve:

1. all objections as to competency, relevancy, materiality, privilege and admissibility as evidence for any purpose in subsequent proceedings or the trial of this or any other action;
2. the right to object on any grounds at any time to the use of any of these disclosures or documents and information obtained as a result of these disclosures, or the subject matter thereof, in any subsequent proceedings or the trial of this or any other action;

3. the right to object on any grounds at any time to a demand for further disclosures pursuant to Federal Rule of Civil Procedure 26 or to other discovery proceedings involving or relating to the subject matter of these disclosures; and

4. the right, at any time, to revise, correct, supplement, clarify and/or amend the disclosures set forth herein.

DISCLOSURES

A. Witnesses

The following individuals are likely to have discoverable information that Defendant may use to support its claims or defenses. Defendant reserves the right to identify additional Individuals likely to have knowledge of discoverable facts as discovery progresses.

1. Douglas Panzer – Plaintiff's Attorney, Fitzpatrick, Lentz & Bubba, PC.

B. Documents

The following is a description by category and location of all documents, data compilations, and tangible things in the possession, custody or control of Defendant, which Defendant may use to support its position in this matter. Categories of documents indicated as being in possession of Defendant are located at Defendant's home office, 286 Upper Powderly street, Carbondale, PA 18407

1. Correspondence between the parties, their agents, and their respective employees relating to the subject matter of the litigation.

Location: In possession of Defendant

C. Experts

None at this time. Defendant reserves the right to name any experts at a later date.

Defendant's investigations is ongoing and Defendant reserves the right to supplement these Initial Disclosures as more information comes into its possession, custody and/or control, or in the event of further filings in this action.

Respectfully submitted,

Dated: May 8, 2017

s/ David J. Catanzaro
David J. Catanzaro
Defendent *Pro Se*
286 Upper Powderly Street
Carbondale, PA 18407
Phone: (570) 282-4889
E-mail: davidjosephus@aol.com

CERTIFICATE OF SERVICE

I, David Catanzaro, hereby certify that a true and correct copy of the forgoing Motion to Dismiss was sent by First Class Mail to the United States District Court for the Eastern District of Pennsylvania and served via First Class Mail upon Plaintiff this 9th day of May 2017 to the following person:

DAN SCHANTZ FARM &
GREENHOUSES, LLC
c/o DOUGLAS PANZER
FITZPATRICK LENTZ & BUBBA
4001 Schoolhouse Lane
Center Valley, PA 18034

s/ David J. Catanzaro
David J. Catanzaro

David Catanzaro
Defendent *Pro Se*
286 Upper Powderly Street
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Phone: (570) 282-4889



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